

# **EXHIBIT J**

## Jacquie Hartmann

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**From:** Justina K. Sessions  
**Sent:** Friday, October 28, 2016 2:33 PM  
**To:** Demetrius Lambrinos (DLambrinos@cpmlegal.com)  
**Cc:** Daniel Purcell  
**Subject:** Auto Parts - Subpoena to Honda

Demetrius,

Please pass this along to the rest of the serving parties. Further to our discussion last week, Honda can make a production including the following documents by November 16, 2016:

- Master contracts with wire harness, bearings, and AVR parts suppliers (to the extent these can be located after a reasonably diligent search)
- Summary of Honda's incentive programs for the time period of the subpoena (to the extent that information can be located after a reasonably diligent search)
- CSS reports (listing all parts, suppliers, and cost prior to mass-production of a vehicle) for each full model change control model for 2005-2015
- Manufacturing quarterly cost quotes for all vehicles manufactured in North America for the subpoena period (with the caveat that Honda's data prior to 1998 is not necessarily reliable or complete)
- Summary documents describing Honda's maker layout evaluation process.

Honda is also willing to meet and confer regarding procurement and pricing documents after those depositions occur. Honda makes this offer without prejudice to seeking its reasonable costs associated with production. If there are any documents or data on this list that the serving parties would not be requesting if cost-shifting were to occur, please let me know immediately and Honda will stop the process of locating and compiling these documents and data.

Please let me know if this offer, as well as Honda's answers to your questions about data, eliminates the need for the serving parties to take depositions on topics 3 and 5 in the outline of 30(b)(6) topics attached to the deposition subpoenas.

Regards,  
Justina

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**Justina K. Sessions**  
Attorney at Law

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